

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**IN THE MATTER OF** )  
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**RAHUL MANCHANDA** )  
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**INDEX NO. 16-10222-JLG**

**REPLY AFFIDAVIT TO  
CONTEMPT OBJECTION BY  
ROBERT MERCER-FALKOFF**

Rahul Manchanda, an Attorney duly admitted to practice throughout the federal, state and local courts of New York State, and in support of his original Motion for Contempt against Robert Mercer-Falkoff, does hereby state:

1. I make this Reply Affidavit to Robert Mercer-Falkoff's Objection to undersigned's Motion for Contempt pursuant to the following points;
2. On the grounds that 11 USC § 362(b)(2) does not exempt from the automatic stay a criminal conspiracy, bad faith litigation, wherein a comprehensive agreement relating to custody/visitation/support was only executed and settled a few weeks before Robert Mercer-Falkoff and his client Sharie Kruzic Manon Maes O'Buck engineered a false arrest of Debtor in conjunction with his ex-girlfriend Kate Bose so that Sharie could (1) move to a remote part of Connecticut to cohabit with another man and (2) vitiate and violate an agreement which was literally only a few weeks old - proof of said conspiracy consists of, but is not limited to, in-court statements by Sharie Kruzic in New Haven Family Court, out of court and in-court statements and admissions by Kate Bose, and notarized letters and faxes by Kate Bose to the Assistant District Attorney Gilbert Rein recanting her statements and admitting the falsity of Debtor's arrest because she was angry that Debtor refused to marry her;
3. Said criminal conspiracy has been reported to federal, state and local law enforcement agencies such as the FBI, USDOJ, NY Attorney General, and other agencies, and upon information and belief said criminal conspiracy is currently being investigated;
4. 11 USC § 362(b)(2) does not exempt from the automatic stay bad faith litigation designed to undermine the full faith and credit of one state simply by moving to another state, after

engineering a criminal conspiracy designed to knock Debtor out of commission so that a new litigation could begin anew a few weeks later, wherein Debtor was both current with his support obligations, wherein there was no grounds or need to stop visitation, and wherein ample evidence exists of forum shopping, criminal conspiracy, bad faith litigation, a setup, and fraud;

5. 11 USC § 362(b)(2) does not exempt from the automatic stay coercive or punitive litigation which is obviously present here, as a vast conspiracy is heretofore alleged by and between Sharie Kruzic, Kate Bose, Robert Mercer-Falkoff, and possibly even Judge Jane Emons and Debtor's own lawyer, Paul V Carty, said conspiracy upon information and belief being investigated by the FBI and other agencies;
- 5a. It is further submitted herein that if this Honorable Court does not allow the automatic stay to remain in effect, that it will be giving credibility and legitimacy to a far-flung criminal conspiracy, giving aid and assistance to known violators of not only federal, state and local law, state-sanctioned legalized kidnapping and extortion under color of law and authority in violation of Title 18 USC Sections 241 and 242, but also in violation of international law treaties that the US Government is a signatory to, such as the United Nations Convention Against Torture ("UNCAT") as well as the United Nations Universal Declaration of Human Rights ("UNUDHR"), as well as actively interfering with and obstructing the upon information and belief at least 5 federal, inter-state, and local criminal investigations currently upon information taking place against all of the above-mentioned actors, as well as others, in direct violation of the Separation of Powers Doctrine ensconced within the United States Constitution.
6. Debtor, at the time of the filing of this Voluntary Petition, was completely current in his Domestic Support Obligations, and even had a surplus in his NYS Child Support Account pursuant to the July 2014 NY Family Court Order, but Robert Mercer-Falkoff and his client's actions, in conjunction with the other parties aforementioned, have once again destabilized and devastated Debtor's finances, ability to work and earn a living, and has pushed him into bankruptcy once again, particularly in light of the over \$500,000 in debt currently not even able to be paid by Debtor;
7. As was stated earlier, there can be no new "establishment of an order for domestic support obligations and concerning custody and visitation of the minor children" because a comprehensive domestic support obligation/ child support/ visitation/ custody universal agreement was executed and notarized only a few weeks before Robert Mercer-Falkoff and

his client Sharie Kruzic started this new litigation in complete and total bad faith, forum shopping, and with the revelation of the above described criminal conspiracy, potentially in a criminally fraudulent manner - neither Robert Mercer-Falkoff nor his client Sharie Kruzic should be able to benefit from their commission of criminal fraud and conspiracy so soon after the prior agreement was executed after nearly 10 years of non-stop, costly, destabilizing, contentious, psychologically and physically damaging, bankruptcy-inducing litigation against Debtor by Sharie Kruzic, who had the benefit of free feminist lawyers such as Sanctuary for Families the entire time, while Debtor had to pay upwards of \$500 an hour for paid lawyers for nearly 10 years straight, destroying his business, finances, children, his mind, body, and soul;

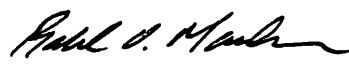
8. Robert Mercer-Falkoff commits perjury in his Objection Motion when he states that Sharie and him commenced their new litigation in 2015 - the reality is that they commenced it only a few weeks after the July 2014 universal settlement agreement in NYS Family Court, and then delayed until they could obtain 6 month residency in Connecticut, moved to withdraw/dismiss that newly NY Family Court case, and then instituted the continued action in CT in January 2015, all the while preventing Debtor from even seeing or speaking to his 2 daughters the entire time, accumulating almost 2 years of this complete cutoff, all the while Debtor duly paid his weekly child support amount pursuant to that July 2014 executed universal settlement agreement;
9. Robert Mercer-Falkoff and his client continue to use Debtor's children as literal pawns in their greed-soaked litigation, not caring about whether or not the children would be permanently scarred from their court sanctioned kidnapping extortion scheme;
10. Even after receiving notification of the instant bankruptcy filing, Robert Mercer-Falkoff continues to try and create controversy and conflict by engaging in additional fishing expeditions by demanding yet even more financial information that Debtor simply does not have, continues to file motions for contempt even when the Judge has ruled no grounds for contempt exists, has actively prevented Debtor from either seeing or speaking with his 2 daughters in almost 2 years, has not allowed Debtor's 70 year old mother to either see or speak to her own grandchildren in almost 2 years, has openly threatened, discriminated against, harassed, humiliated, insulted, and harangued Debtor and his 70 year old mother in court mercilessly for no reason, while both him and his client do whatever they want, and is otherwise looking for other grounds to either raise his current child support order in a NY Family Court Order and Agreement dated only July 2014, when

Debtor is literally at the gates of financial oblivion and full stress, or is otherwise trying to devise ways of hurting and harming Debtor, his family, and his 2 children in his blatantly unethical attorney tactics and misconduct;

11. On the grounds that nothing less than a fine and incarceration will persuade Robert Mercer-Falkoff to comply with this Honorable Court's Automatic Stay and Protection from his threatening, harassing, collecting, litigating, intimidating, filing claims, motions and pleadings, and otherwise violating federal bankruptcy protection;
12. On the grounds that if Robert Mercer-Falkoff is not forced to comply with this Honorable Court's Automatic Stay and Protection from his threatening, harassing, collecting, litigating, intimidating, filing claims, motions and pleadings, and otherwise violating federal bankruptcy protection, Robert Mercer-Falkoff will have reduced federal bankruptcy protection to a shambles;
13. On the grounds that Robert Mercer-Falkoff's willful and intentional noncompliance with the Automatic Stay and Protection prohibiting his criminal conspiracy, fraud, forum shopping, unethical conduct, threatening, harassing, collecting, litigating, intimidating, filing claims, motions and pleadings, and otherwise violating federal bankruptcy protection of this Honorable Court have defeated, impaired, impeded and prejudiced Debtor's rights;
14. for such other further relief as this Honorable Court deems just and proper, including civil and criminal contempt, costs, and sanctions against Robert Mercer-Falkoff for violation of the US Federal Bankruptcy Law and in light of the information contained herein.

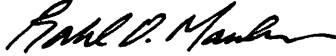
**WHEREFORE**, in light of the foregoing, Undersigned hereby respectfully requests that this Honorable Court (a) deny Robert Mercer-Falkoff's Motion in Opposition to the underlying Contempt Action against him, (b) sanction him for violation of the automatic stay and for his false, fraudulent, misleading, and perjurious statements on the record, (c) award Debtor costs and Fees, (d) and finally, let this Court grant such other and further relief as this Court deems to be just and proper under the circumstances.

**Dated:** February 17, 2016  
New York, NY

  
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**ATTORNEY CERTIFICATION OF SERVICE**

On February 17, 2016 the undersigned did deliver a copy of the attached Reply Affidavit to Respondent by US Mail at the following location: Robert Mercer-Falkoff, 678 Main Street, Branford CT 06405.



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Rahul Manchanda, Esq.